



DEPARTMENT OF THE ARMY
HEADQUARTERS 54TH BRIGADE ENGINEERING BATTALION
173 INFANTRY BRIGADE COMBAT TEAM (AIRBORNE)
APO, AE 09605

AESE - BG

28 September 2021

MEMORANDUM FOR: Commander, 54th BEB, Brigade Engineer Battalion (Airborne)

SUBJECT: Temporary Administrative Exemption from Immunization for SSG Brown, Steven M.
(DODID: 1464975043)

1. References

- a. AR 40-562, Immunizations and Chemoprophylaxis, 29 SEP, 2006.
- b. AR 600-20, Army Command Policy, 24 JUL 2020.
2. On 27 September 2021, I conducted an in person discussion with SSG Steven Brown regarding a temporary administrative exemption from immunization against the SARS-CoV-2 Virus (COVID-19) as he would be willing to receive Pfizer's vaccine Comirnaty but not the on hand Pfizer-BioNTech COVID-19 Vaccine as he believes this would be an unlawful order
3. Medical Counseling: SSG Brown was rational during our in clinic discussion. He was extensively counseled to make an informed decision. We discussed the following:
 - a. COVID-19 Vaccination is NOT gene therapy
 - b. Meta-analysis demonstrate that the morbidity and mortality will greatly outweigh any risk associated with *unexpected* side effects 10 years from now from any EUA/FDA vaccine available
 - c. The current vaccines one hand does not have the label Comirnaty on the vile however this vaccine is identical to the current Pfizer-BioNTech COVID-19 Vaccine that has been administered in our footprint. These have the SAME formulation
4. According to the attached memo by the assistant secretary of defense, "DoD health care providers will use both the Pfizer- BioNtech COVID-19 vaccine and the Comimaty COVID-19 vaccine interchangeably for the purpose of vaccinating service members in accordance with the Secretary of Defense Memorandum,..."
5. Recommendation: There is no evidenced based medicine that would preclude SSG Brown from being vaccinated against COVID-19 IAW current guidelines.
6. The point of contact for this memorandum is the undersigned at 314-590-9845 or Richard.d.palomino.mil@mail.mil

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Date: 2021.09.28
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